

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF DELAWARE**

In re:)	
)	Chapter 11
)	
JOANN INC., ¹)	Case No. 25-10068 (CTG)
)	
Post-Effective Date Debtor.)	
)	Re: Docket No. 1860

**CERTIFICATION OF COUNSEL REGARDING PLAN ADMINISTRATOR’S
SEVENTEENTH (SUBSTANTIVE) OMNIBUS OBJECTION TO CERTAIN CLAIMS
(Unliquidated Claims and Overstated Claims)**

The undersigned counsel to the Plan Administrator in the above-captioned case hereby certifies as follows:

1. On December 3, 2025, the *Plan Administrator’s Seventeenth (Substantive) Omnibus Objection to Certain Claims (Unliquidated Claims and Overstated Claims)* [Docket No. 1860] (the “Objection”) was filed with the United States Bankruptcy Court for the District of Delaware (the “Court”). Attached thereto as Exhibit A was a proposed form of order granting the relief requested in the Objection (the “Proposed Order”).

2. Pursuant to the notice of the Objection, the deadline to file a response to the Objection was December 29, 2025 at 4:00 p.m. (prevailing Eastern Time) (the “Response Deadline”).

3. Prior to the Response Deadline, the Plan Administrator received informal responses to the Objection and Proposed Order from the following claimants, or their counsel, including: (i) B33 Shops at Centerpoint III LLC (Claim No. 19765), (ii) NNN Reit, LP (Claim No. 19525),

¹ The Post-Effective Date Debtor in this chapter 11 case, along with the last four digits of its federal tax identification number, is JOANN Inc. (5540). The Post-Effective Date Debtor’s mailing address is 5555 Darrow Road, Hudson, Ohio 44236.

(iii) Milan Real Estate Investments, LLC (Claim No. 19045), (iv) Fox Run Limited Partnership (Claim No. 18724), (v) Brixmor-Lakes Crossing, LLC (Claim No. 19503), (vi) Brixmor SPE 4 LLC (Claim No. 19495); (vii) Brixmor SPE 3 LLC (Claim No. 18749), (viii) Brixmor GA Seacoast Shopping Center LLC (Claim No. 18747), (ix) MP Northglenn Investors, LLC (Claim No. 19568), (x) Arsenal Plaza Associates, LLC (Claim No. 18369), (xi) Vestal Parkway Plaza LLC (Claim No. 19541), (xii) Shopping Center Associates (Claim No. 19566), (xiii) WHLR - Village of Martinsville, LLC (Claim No. 18746), (xiv) HV Center LLC, HV Center TIC 1 LLC, HV Center TIC 2 LLC (Claim No. 18764), (xv) Arbor Square II, LLC (Claim No. 19542), (xvi) RSS WFRBS2001-C3-DE PMHN, LLC (Claim No. 18755), (xvii) IN-Goshen Market, LLC (Claim No. 19374), (xviii) Columbia (Northpointe) WMS, LLC (Claim No. 18748), (xix) Frederick County Square Improvements, LLC (Claim No. 19551), (xx) University Place Improvements Owner LLC (Claim No. 18734), (xxi) Taylor Square Holdings, LLC (Claim No. 19549), (xxii) CH Realty X-DLC R Wheaton Danada West, L.L.C. (Claim No. 18637), and (xiii) ARD MacArthur LLC (Claim No. 19167) (collectively, the “Claimants”).

4. No other claimant has responded to the Plan Administrator’s Objection.

5. To resolve certain of the Claimants’ informal responses, the Plan Administrator and certain Claimants, agreed to a revised Proposed Order, a copy of which is attached hereto as

Exhibit A (the “Revised Proposed Order”).²

² The Plan Administrator’s Objection with respect to: Arsenal Plaza Associates, LLC (Claim No. 18369), Vestal Parkway Plaza LLC (Claim No. 19541), Shopping Center Associates (Claim No. 19566), WHLR - Village of Martinsville, LLC (Claim No. 18746), HV Center LLC, HV Center TIC 1 LLC, HV Center TIC 2 LLC (Claim No. 18764), Arbor Square II, LLC (Claim No. 19542), RSS WFRBS2001-C3-DE PMHN, LLC (Claim No. 18755), IN-Goshen Market, LLC (Claim No. 19374), Columbia (Northpointe) WMS, LLC (Claim No. 18748), Frederick County Square Improvements, LLC (Claim No. 19551), University Place Improvements Owner LLC (Claim No. 18734), Taylor Square Holdings, LLC (Claim No. 19549), CH Realty X-DLC R Wheaton Danada West, L.L.C. (Claim No. 18637), and ARD MacArthur LLC (Claim No. 19167), has been adjourned to the omnibus hearing scheduled for January 28, 2026 at 10:00 a.m. (ET).

6. A redline comparing the Revised Proposed Order against the Proposed Order is attached hereto as **Exhibit B**.

7. The Plan Administrator respectfully requests that the Court enter the Revised Proposed Order at its earliest convenience.

Dated: January 9, 2026
Wilmington, Delaware

/s/ Michael E. Fitzpatrick

COLE SCHOTZ P.C.

Patrick J. Reilley (No. 4451)
Stacy L. Newman (No. 5044)
Jack M. Dougherty (No. 6784)
Michael E. Fitzpatrick (No. 6797)
500 Delaware Avenue, Suite 600
Wilmington, Delaware 19801
Telephone: (302) 652-3131
Facsimile: (302) 652-3117
Email: preilley@coleschotz.com
snewman@coleschotz.com
jdougherty@coleschotz.com
mfitzpatrick@coleschotz.com

- and -

HAHN LOESER & PARKS LLP

Christopher B. Wick (admitted *pro hac vice*)
Philip K. Stovall (admitted *pro hac vice*)
200 Public Square, Suite 2800
Cleveland, Ohio 44114
Telephone: (216) 274-2489
Facsimile: (216) 241-2824
Email: cwick@hahnlaw.com
pstovall@hahnlaw.com

Co-Counsel to the Plan Administrator